## UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF NORTH CAROLINA RALEIGH DIVISION

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PEGGY B. DEANS, CLERK U.S. BANKRUPTCY COURT U.S. BANKRUPTCY OF N.C. BASTERN DISTRICT OF N.C.

	)	EASTERN
IN RE:	)	CHAPTER 7
INTERNATIONAL HERITAGE, INC.	)	CASE NO. 98-02675-5-ATS
INTERNATIONAL HERITAGE, INCORPORATED,	) ) )	CHAPTER 7 CASE NO. 98-02674-5-ATS
Debtors.	)	

# INTERIM APPLICATION FOR SPECIAL ATTORNEY FOR TRUSTEE FEE AND EXPENSE REIMBURSEMENT

The undersigned Stephani W. Humrickhouse of Nicholls & Crampton, P.A. ("Applicant") applies to the Court for the entry of an Order approving and authorizing interim Special Attorney for Trustee's fees for the period November 28, 2000, to February 28, 2001, in the amount of \$25,902.00, and expense reimbursement in the amount of \$1,248.97. In support of said Interim Application, Applicant respectfully shows the Court the following:

- 1. Applicant has acted as Special Attorney for the Trustee since employed and appointed by Order dated January 28, 1999. The services rendered by Applicant and members of its firm have been substantial and Applicant believes that allowance of a fee in full at this time is appropriate and necessary. Additionally, in light of the substantial commitment of time and resources by the Applicant and her firm during this period evaluating the ninety-two (92) avoidance actions initiated, evaluating settlement offers and setting up and implementing a system for the administration of these avoidance actions. Applicant requests that the Court consider this Application at this time notwithstanding the fact that the previous fee application was filed less than 120 days ago on November 27, 2000.
- 2. Fees in the amount of \$45,219.50 and expenses in the amount of \$1,384.56 have been applied for by the Applicant and approved by the Court prior to this Application.
- 3. To date, the Applicant has delivered the sum of \$67,712.51 to the Trustee for preferences collected prior to the initiation of adversary proceedings. The Applicant has also settled approximately 30 adversary proceedings pending court approval for an additional sum of \$164,671.64. Monies are collected by the Applicant and delivered to the Trustee to hold in trust pending Court approval. Default has been entered in approximately 16 adversary proceedings. Approximately 46 adversary proceedings remain to be administered.

- 4. A Summary of Services Rendered which indicates the name of the attorney or paralegal, the hours spent, the hourly rate and total compensation requested is attached as Exhibit A. Attached as Exhibit B is a breakdown by hours and description of the services rendered in connection with this Application. Services rendered were reasonable and necessary in the proper representation of the Trustee. Said Exhibit B reflects an itemization of expenses incurred on behalf of the Trustee by category totals. A separate statement has been created for each adversary proceeding in which time has been entered so that settlement offers can be evaluated more efficiently.
- 5. The Trustee's agreement to pay the fees at the rates set out herein are substantiated in its Application by Trustee for Authority to Employ and Appoint Attorney Specially dated January 27, 1999. Stephani W. Humrickhouse has rendered professional services of not less than 96 hours and that for such professional services Trustee agreed to pay the rate of \$165.00 per hour. Phyllis W. Hill has rendered paralegal services of not less than 54.80 hours and that for such paralegal services Applicant is regularly paid at the rate of \$65.00 per hour. Sandra T. Waller has rendered paralegal services of not less than 1.30 hours and that for such paralegal services Applicant is regularly paid at the rate of \$65.00. Mary J. Baird has rendered paralegal services of not less than 98.70 hours and that for such paralegal services Applicant is regularly paid at the rate of \$65.00.
- 6. Stephani W. Humrickhouse is a Partner with Nicholls & Crampton, P.A. She is a Board Certified Specialist in Bankruptcy Law by the North Carolina State Bar Board of Legal Specialization, is a former member of the Bankruptcy Council of the North Carolina Bar Association, previously served as Chairman of its Continuing Legal Education Committee, is a Certified Bankruptcy Specialist by the American Bankruptcy Certification Board and is an experienced Chapter 11 bankruptcy practitioner. Humrickhouse was admitted to the bar in 1980. Humrickhouse regularly charges and has been paid as her ordinary rate \$210.00 per hour. However, based on Court guidelines for the representation of the Trustee, she has only charged \$165.00 per hour during the time period covered by this Application in this case.
- 7. Phyllis W. Hill is a Paralegal with Nicholls & Crampton, P.A. She attended the University of Tennessee in Knoxville, TN majoring in Business Administration and received her paralegal/legal assistant degree from UT. She has been a paralegal since 1977 with seven years experience in Tax, Estate Planning, Trust and Estate Administration in Knoxville, TN, eight years experience in Civil Litigation with Hunton & Williams in Raleigh, NC and has been with Nicholls & Crampton since February, 1993, concentrating in Bankruptcy.
- 8. Sandra T. Waller is a Paralegal with Nicholls & Crampton, P.A. She attended Florida State University, Tallahassee, FL and received her paralegal/legal assistant training at Lively Vocational/Technical School, Tallahassee, FL. She has been a paralegal since 1982 with experience in Personal Injury, Medical Malpractice and Litigation. She has been employed at Nicholls & Crampton since January, 1998, concentrating in Bankruptcy.

- 9. Mary Jane Baird is a Paralegal with Nicholls & Crampton, P.A. She has been a paralegal for 24 years with experience in Medical Malpractice and Insurance Defense. She was last employed with the law firm of Maloof, Lebowitz, Conahan and Oleske in Chatham, New Jersey for 17 years. She has been employed with Nicholls & Crampton since December, 2000, concentrating in Bankruptcy.
- 10. Copying charges are recorded by client identification number, pursuant to a control counting device connected to Applicant's copying machine. The copying charges are read by Applicant's Office Administrator twice monthly, at mid and end month, and entered into the Accounting Package on those "read" dates. Applicant does not have the ability to further break down the dates such copying charges were incurred other than as expressed above
  - 11. Postage charges for are entered cumulatively at month's end.
- 12. Copies are charged at 20¢ per page, and fax transmissions are charged at \$1.00 per page for out-going transmissions, with no charge for incoming faxes. Deliveries are charged at the rate of \$7.50. Mileage reimbursement was made at the rate of 31¢ per mile.
- 13. The best interests of Trustee, the Debtor, and the Estates will be served by the allowance of this Application in full.

WHEREFORE, Applicant respectfully requests the Court for the entry of an Order allowing and authorizing Special Attorney for Trustee fees in the amount of \$25,902.00, and expense reimbursement in the amount of \$1,248.97.

This the  $6^{-70}$  day of March, 2001.

Stephane J. Lunrecklouse Stephani W. Humrickhouse

State Bar No. 9528

Attorney for Trustee

Nicholls & Crampton, P.A.

Post Office Box 18237

Raleigh, NC 27619

Telephone: 919/781-1311

## UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF NORTH CAROLINA RALEIGH DIVISION

)	
)	CHAPTER 7
)	CASE NO. 98-02675-5-ATS
)	
)	CHAPTER 7
)	CASE NO. 98-02674-5-ATS
)	
)	
	) ) ) ) )

## SUMMARY OF SERVICES RENDERED

Nicholls & Crampton, P.A.

From November 28, 2000 through February 28, 2001, the undersigned person/firm has performed professional services for this estate in the capacity of attorney for the Trustee during the Chapter 7 case. Attached hereto is an itemization of time expended and expenses incurred in the performance of these professional services.

1		HOURS	HOURLY	
NAME	TITLE	SPENT	RATE	TOTAL
Stephani W. Humrickhouse	Partner	96.00	\$165.00	\$15,840.00
Phyllis W. Hill	Paralegal	54.80	\$ 65.00	\$ 3,562.00
Sandra T. Waller	Paralegal	1.30	\$ 65.00	\$ 84.50
Mary J. Baird	Paralegal	98.70	\$ 65.00	\$ 6,415.50
		TO	OTAL FEES	\$25,902.00
		TC	OTAL EXPENSES	S \$ 1,248.97
	TOT	AL AMOUN	T REQUESTED	\$27,150.97

O:\CHP7TR\InternationalHeritage\attyfee.sum.004.wpd

# NICHOLLS&CRAMPTON, P.A.

### ATTORNEYS AT LAW

4300 Six Forks Road—Suite 700 Post Office Box 18237 Raleigh, North Carolina 27619

Telephone: 919/781-1311 Fax: 919/782-0465

Federal ID # 56-1201204 nvoice 34593

03/06/01

Holmes P. Harden

TOC/o Maupin, Taylor & Ellis, PA 3200 Beechleaf Ct. POB 19764: Raleigh NC 27604

Client Id. 00-12075

Matter Id. 000-000-001 SH/G - International Heritage, Inc - Chapter 7

Amount Paid:

			Amount Paid:
		For legal services rendered; including but not limited to	Return Upper Portion With Payment
11/28/00	HUM	Various general creditor calls	. 50
11/29/00	HUM	Prepare fee application	1.00
11/29/00	PL9	AP status follow-up.	. 50
11/30/00	HUM	Letter to Protection One	. 30
11/30/00	P20	Deliver Special Attorney Fee App. to Holmes Harden	. 30
12/04/00	HUM	Update files re: extensions, summonses	. 30
12/06/00	HUM	Call to Jim Clary re: Calco settlement	.20
12/12/00	PL9	Work on AP status tracking spreadsheet.	4.00
12/12/00	HUM	Letter to Larry Robbins re: BTI statute of limitations	. 30
12/15/00	HUM	Conf. with Brent Wood re: status	. 30
12/16/00	HUM	Response to BA inquiries '	. 40
12/18/00	HUM	Call to Larry Robbins re: BTI SOL	. 20
12/19/00	HUM	Various confs. with Robbins re:	.80

A finance charge is computed on account balances unpaid 30 days after the billing date at a periodic rate of  $1\frac{1}{2}$ % per month (Annual percentage rate of 18%).

BTI tolling agreement, letters re:

# NICHOLLS&CRAMPTON, P.A.

### ATTORNEYS AT LAW

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Federal ID # 56-1201204
Invoice 34593

2

Page

03/06/01

TOHolmes P. Harden c/o Maupin, Taylor & Ellis, PA 3200 Beechleaf Ct. POB 19764 Raleigh NC 27604

Client Id. 00-12075

Matter Id. 000-000-001 SH/G - International Heritage, Inc - AChapten 7

Matter Id.	000-	000-001 SH/G - International Heritage,	Inc - A后传通R中的: 7
			Return Upper Portion With Payment
		same	
12/20/00	HUM	Review status of contracts, transmit status letter to Holmes (1.8); Letter to Boyles re: AP status (.3)	2.10
12/28/00	HUM	Prepare for and attend fee app. hearing	.80
12/29/00	ним	Extended conf. with Holmes Harden re: Section 548 Claim against Brent Wood (.4); Review status of AP's, update files (1.3)	1.70
12/30/00	HUM	Review AP's for possible default candidates and create default procedure	. 80
01/01/01	P33	Review of all files in their entirety for preparation and filing of Extensions of Time, Voluntary Dismissals, Authority to Compromise and Defaults	2.50
01/04/01	P33	Continuation of review of files in their entirety re: Extensions, Authority to Compromise, Voluntary Dismissals, Defaults to be entered, Answers filed	1.50
01/04/01	HUM	Draft statement regarding intent to compromise and statement regarding informal extensions	. 80

# NICHOLLS&CRAMPTON, P.A.

### ATTORNEYSATLAW

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Telephone: 919/781-1311 Fax: 919/782-0465

Federal ID # 56-1201204
Invoice 34593
Page 3

03/06/01

TOHolmes P. Harden c/o Maupin, Taylor & Ellis, PA 3200 Beechleaf Ct. POB 19764

3200 Beechleaf Ct. POB 19764 Raleigh NC 27604

address.

Client Id. Matter Id.		2075 000-001 SH/G - International Heritage,	Inc - Afilian Prit: 7
			Return Upper Portion With Payment
01/06/01	HUM	Review and finalize statements regarding compromise	.80
01/08/01	HUM	Review status of defaults, extensions and pretrials	1.20
01/11/01	PL9	Prepare adversary proceeding case chart for tracking details,	4.50
		summons issued, service, answers, settlement status and pre-trial matters for all ninety-one cases filed.	:
01/13/01	HUM	Letter to Larry Robbins re: status of limitations re: BTI	. 30
01/15/01	HUM	Review status of compromises, defaults, service of summons, determine necessity of reissuance of summonses	1.30
01/15/01	PL9	Continue working on adversary proceeding case chart.	1.50
01/16/01	HUM	Work on tolling agreement with BTI, letter to Holmes re: BTI	. 40
01/18/01	HUM	Check status of defaults, extensions, compromises	1.20
01/18/01	PL9	Re: Freddie Rick adversary proceeding, search for service	.80

ATTORNEYS AT LAW

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Telephone: 919/781-1311 Fax: 919/782-0465

Federal ID = 56-1201204 **34593** Page

03/06/01

<sup>TO</sup>Holmes P. Harden c/o Maupin, Taylor & Ellis, PA 3200 Beechleaf Ct. POB 19764 Raleigh NC 27604

Client Id. 00-12075

Matter Id.		-000-001 SH/G - International Heritage,	Inc - ACtorntent: 7
			Return Upper Portion With Payment
01/18/01	PL9	Work on adversary proceeding case chart.	1.00
01/19/01	P2Ø	Docket and Set up Pretrial Conf. Calls with BTI Long Distance Operator	. 30
01/19/01	HUM	Review status of defaults, compromises, and extensions	. 50
01/22/01	P33	Drafting, finalization and filing of Notice of Voluntary Dismissal.	. 30
01/22/01	PL9	Worrk on draft of Motion to Compromise and Settle Adversary Proceedings, draft of motion for entry of default and default judgments, continue work on AP case status chart.	4.00
01/27/01	HUM	Transmit tolling agreement to Robbins re: BTI	. 20
01/30/01	P20	Set up Pretrial Conf. Calls with BTI Operator	. 10
01/31/01	PL9	Work on adversary proceeding case status chart.	1.00
Ø2/Ø2/Ø1	HUM	Conf. with Holmes re: possible distribution to unsecured creditors	.20

# NICHOLLS&CRAMPTON, P.A.

### ATTORNEYS AT LAW

4300 Six Forks Road—Suite 700 Post Office Box 18237 Raleigh, North Carolina 27619

Telephone: 919/781-1311 Fax: 919/782-0465

Federal ID # 56-1201204
Invoice 34593
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03/06/01

TOHolmes P. Harden c/o Maupin, Taylor & Ellis, PA 3200 Beechleaf Ct. POB 19764 Raleigh NC 27604

Client Id. 00-12075

Matter Id. 000-000-001 SH/G - International Heritage, Inc - Ashantent: 7

			Return Upper Portion With Payment
02/05/01	HUM	Review default forms	. 50
02/07/01	HUM	Review pretrial orders and extensions	1.30
02/12/01	HUM	Review memo from Hukazalie and deliver to Harden (.4); Review files for training pool complaints (.3)	. 70
02/13/01	ним	Review forms of motions to compromise, check status of settled claims, review files for training pool claims, letter to Court re: similar training pool claims, prepare compromise notices and orders	3.60
02/14/01	HUM	Prepare proposed order form for compromise	.60
02/20/01	PL9	Status review of advesary proceeding files and search for new addresses for re-issuance of summons, work on case summary chart.	2.00
02/20/01	HUM	Review status of cases and deadlines	.50
02/21/01	HUM	Letter to clerk re: trial dates	.20
02/23/01	HUM	Docketing and reviewing discovery	.50
		A finance charge is computed on account balances uppaid 3	O days

ATTORNEYS AT LAW

4300 Six Forks Road—Suite 700 Post Office Box 18237 Raleigh, North Carolina 27619

Telephone: 919/781-1311 Fax: 919/782-0465

Federal ID ≠ 56-1201204 Invoice Page 6

03/06/01

TOHolmes P. Harden c/o Maupin, Taylor & Ellis, PA 3200 Beechleaf Ct. POB 19764 Raleigh NC 27604

Client Id. 00-12075

Matter Id. 000-000-001 SH/G - International Heritage, Inc - Achartem: 7

Return Upper Portion With Payment deadlines, trial dates, etc. 02/26/01 HUM Reivew status of reports, .5Ø pretrials, orders 02/28/01 HUM Conf. with Harden re: status of . 40 cases, 548 causes of action and Van Etten settlement Fees Billed 5,770.50

> Disbursements Computer Research 30:00 \$ Delivery Charge 240.00 Postage 79.98 Travel 5.67 Fax 72.00 Copies 248.00 Telephone Charges 174.00

> > Total Disbursements 849.65 Total Current Bill 6,620.15 Balance Due 6,620.15

# NICHOLLS&CRAMPTON, P.A.

ATTORNEYS AT LAW

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Telephone: 919/781-1311 Fax: 919/782-0465

Federal ID # 56-1201204 Invoice 34593 Page 7

03/06/01

TOHolmes P. Harden c/o Maupin, Taylor & Ellis, PA 3200 Beechleaf Ct. POB 19764 Raleigh NC 27604

Client Id. 00-12075

Matter Id. 000-000-001 SH/G - International Heritage, Inc -AchaRteid: 7

Return Upper Portion With Payment

## Fee Summary

S W Humrickhouse worked 25.40 hours at \$165 an hour. Paralegal PWH worked 19.30 hours at \$65 an hour. S T Waller worked .70 hours at \$65 an hour. M J Baird-Paralegal worked 4.30 hours at \$65 an hour

ATTORNEYS AT LAW

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Telephone: 919/781-1311 Fax: 919/782-0465

Federal ID # 56-1201204 **3459**4

03/06/01

Holmes P. Harden

TOc/o Maupin, Taylor & Ellis, PA 3200 Beechleaf Ct. POB 19764

Raleigh

NC 27604

Client Id. 00-12075

Matter Id.	000-	000-002 SWH - Intn'l Heritage	,Inc / ACT		Inc. int Paid: _	
		For legal services rendered; but not limited to	including	Return Upper	Portion V	With Payment
01/15/01	P33	Complete review of file, reorganization of same, runn docket check list.	ing of	. 40		
02/09/01	PL9	Draft Motion and Affidavit f Entry of Default, Entry of Default, Motion for Default Judgment and Default Judgmen		1.50		
02/09/01	HUM	Review and sign default pape	rs	.20		
		Fees B	illed		\$	156.50
	Disb	ursements				
	Copi	e s	\$	3.60	<b>ð</b> .	
		Total	Disbursemen	nts	\$	3.60
		Total	Current Bi	11	\$	160.10
		Balanc	e Due		\$	160.10 =======

## Fee Summary

M J Baird-Paralegal worked .40 hours at \$ 65 an hour. Paralegal PWH worked 1.50 hours at \$ 65 an hour. 5 W Humrickhouse worked .20 hours at \$165 an hour.

# NICHOLLS&CRAMPTON, PA.

### ATTORNEYS AT LAW

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Federal ID # 56-1201204 Invoice 34595

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03/06/01

Holmes P. Harden

TOc/o Maupin, Taylor & Ellis, PA 3200 Beechleaf Ct. POB 19764 Raleigh NC 27604

Client Id. 00-12075

Matter Id. 000-000-003 SWH - Intn'l Heritage, Inc. / Golf-Tech. Holding, Inc

Amount Paid: Return Upper Portion With Payment For legal services rendered; including but not limited to 01/17/01 P33 Complete review of file, - 40 reorganization of same, running of docket check list. 02/19/01 Draft Motion and Affidavit for .70 Entry of Default and Entry of Default. HUM Finalize default papers 02/20/01 .30 Fees Billed \$ 121.00 Disbursements Copies 1.40 Total Disbursements Total Current Bill 122,40 Balance Due 122,40

## Fee Summary

M J Baird-Paralegal worked .40 hours at \$ 65 an hour. Paralegal PWH worked .70 hours at \$ 65 an hour. S W Humrickhouse worked .30 hours at \$165 an hour.

# NICHOLLS&CRAMPTON, P.A.

### ATTORNEYS AT LAW

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Telephone: 919/781-1311 Fax: 919/782-0465

Federal ID # 56-1201204

03/06/01

Molmes P. Harden

TOc/o Maupin, Taylor & Ellis, PA 3200 Beechleaf Ct. POB 19764 Raleigh NC 27604

Client Id. 00-12075

Matter Id. 000-000-004 SWH - Intn'lHeritageInc / USOff.Prod/CarolinaDist

Amount Paid: Return Upper Portion With Payment For legal services rendered; including but not limited to .30 12/06/00 Conf. with Wagas Durrane re: HUM extension Conf. with Wagas Durrani re: .20 01/08/01 HUM settlement .50 01/09/01 P33 Preparation and Filing of 'Statement/Extension of Time, correspondence to Court . 40 01/17/01 P33 Complete review of file, reorganization of same, running of docket check list. Drafting, finalization and filing .30 01/30/01 P33 of Statement/Intent to Move to Compromise. . 50 Letter to defendant with proof of 02/27/01 PL9 claim, letter to Trustee with settlement check. Fees Billed 193.00 Disbursements \$ 7.50 Delivery Charge 2.80 Copies . 68 Postage

# NICHOLLS&CRAMPTON, P.A.

### ATTORNEYS AT LAW

4300 Six Forks Road—Suite 700 Post Office Box 18237 Raleigh, North Carolina 27619

Telephone: 919/781-1311 Fax: 919/782-0465

Federal ID # 56-1201204 Invoice 34596

03/06/01

TOHolmes P. Harden c/o Maupin, Taylor & Ellis, PA 3200 Beechleaf Ct. POB 19764 Raleigh NC 27604

Client Id. 00-12075

Matter Id. 000-000-004 SWH - Intn'lHeritageInc / USOff.ProdAconthimaDist

Return Upper Portion With Payment

Page

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Balance Due	\$	203,98
Total Current Bill	\$	203.98
Total Disbursements	\$	10.98

### Fee Summary

S W Humrickhouse worked .50 hours at \$165 an hour, M J Baird-Paralegal worked 1.20 hours at \$ 65 an hour Paralegal PWH worked .50 hours at \$ 65 an hour.

# NICHOLLS&CRAMPTON, P.A.

ATTORNEYS AT LAW

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Telephone: 919/781-1311 Fax: 919/782-0465

Federal ID # 56-1201204

03/06/01

Holmes P. Harden

TOC/o Maupin, Taylor & Ellis, PA 3200 Beechleaf Ct. POB 19764 Raleigh NC 27604

Client Id. 00-12075

Matter Id. 000-000-005 SWH - Intn'lHeritageInc / Forrester-Smith, Inc Amount Paid: \_ Return Upper Portion With Payment For legal services rendered; including but not limited to 11/30/00 HUM Call from creditor re: settlement .30 01/05/01 P33 Preparation/Drafting of Statement: .50 regarding Intent for Authority to Compromise 01/08/01 P33 Finalization and Filing of .50 Statement regarding Intent for Authority to Compromise .50 02/12/01 Preparation and filing of Motion P33 to Compromise and Settle Adversary Proceeding. 02/14/01 P33 Preparation and filing of Order . 50 Approving Compromise and Settlement of Adversary Proceeding. Fees Billed 179,50 Disbursements .34 Postage Copies 1.20 Total Disbursements 1.54 Total Current Bill 181.04

# NICHOLLS&CRAMPTON, P.A.

ATTORNEYSATLAW

4300 Six Forks Road—Suite 700 Post Office Box 18237 Raleigh, North Carolina 27619

Telephone: 919/781-1311 Fax: 919/782-0465

Federal ID # 56-1201204
Invoice 34597
Page 2

03/06/01

TO Holmes P. Harden c/o Maupin, Taylor & Ellis, PA 3200 Beechleaf Ct. POB 19764 Raleigh NC 27604

Client Id. 00-12075

Matter Id. 000-000-005 SWH - Intn'lHeritageInc / Forrester-Ambthpailinc

Return Upper Portion With Payment

Balance Due

\$ 181.04

### Fee Summary

S W Humrickhouse worked .30 hours at \$165 an hour. M J Baird-Paralegal worked 2.00 hours at \$ 65 an hour In Assount With

# NICHOLLS&CRAMPTON, P.A.

ATTORNEYS AT LAW

4300 Six Forks Road—Suite 700 Post Office Box 18237 Raleigh, North Carolina 27619

Telephone: 919/781-1311 Fax: 919/782-0465

Federal ID = 56-1201204

03/05/01 Holmes P. Harden

TOC/o Maupin, Taylor & Ellis, PA 3200 Beechleaf Ct. POB 19764 Raleigh NC 27604

Client Id. 00-12075

Matter Id. 000-000-006 SWH - Intn'lHeritageInc / Toner Solutions Inc

Amount Paid:

			Return Upper Portion With Payment
		For legal services rendered; including but not limited to	
12/15/00	HUM	Review letter from counsel	. 30
12/18/00	HUM	Conf. with Clerk re: extension	. 20
01/05/01	HUM	Review Sparkman letter re: ordinary course defense	. 30
01/06/01	HUM	`Review answer (.3); Letter to Richard Sparkman re: check (.6)	<sup>;</sup> . 9ø
01/11/01	HUM	Review pretrial order	. 10
01/17/01	P33	Complete review of file, reorganization of same, running of docket check list.	. 40
01/19/01	HUM	Letter to Sparkman re: settlement	.20
02/12/01	P33	Preparation and filing of Motion to Compromise and Settle Adversary Proceeding.	. 50
02/13/01	PL9	Draft Motion for Authority to Compromise, letter to defendant with proof of claim.	. 80
02/14/01	P33	Preparation and filing of Order Approving Compromise and Settlement of Adversary Proceeding.	. 50

# NICHOLLS&CRAMPTON, P.A.

### ATTORNEYS AT LAW

4300 Six Forks Road—Suite 700 Post Office Box 18237 Raleigh, North Carolina 27619

Telephone: 919/781-1311 Fax: 919/782-0465

Federal ID # 56-1201204

2

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e 010

03/06/01

TOHolmes P. Harden c/o Maupin, Taylor & Ellis, PA 3200 Beechleaf Ct. POB 19764 Raleigh NC 27604

Client Id. 00-12075

Matter Id. 000-000-006 SWH - Intn'lHeritageInc / Toner Solu和inone Plide

Return Upper Portion With Payment

	Fees Billed		 \$	473.00
Disbursements				
Postage	· \$	1.01		
Fax	\$	6.00		
Copies ,	<b>\$</b> ;	2.00		
	Total Disbursements		<b>6</b>	9.01
	Total Current Bill	,	\$	482.01
	Balance Due		\$ =====	482.01

### Fee Summary

S W Humrickhouse worked 2.00 hours at \$165 an hour. M J Baird-Paralegal worked 1.40 hours at \$ 65 an hour Paralegal PWH worked .80 hours at \$ 65 an hour.

# NICHOLLS&CRAMPTON, PA.

ATTORNEYSATLAW

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Telephone: 919/781-1311 Fax: 919/782-0465

Federal ID # 56-1201204

03/06/01

Holmes P. Harden

TO c/o Maupin, Taylor & Ellis, PA
3200 Beechleaf Ct. POB 19764:
Raleigh NC 27604

Client Id. 00-12075

Matter Id. 000-000-007 Swh - Intn'lHeritageInc. "FYI" Worldwide. Inc.

matter 10.	. 000-	-000-007 Swh - Intn'lHeritageInc. "FYI" Wo		nt Paid:	
		For legal services rendered; including but not limited to	eturn Upper	Portion W	ith Payment
01/17/01	P33	Complete review of file, reorganization of same, running of docket check list.	. 40		
02/19/01	PL9	Entry of Default and Entry of Default.	.70		
Ø2/19/Ø1	PL9	Draft Motion and Affidavit for Entry of Default and Entry of Default.	.70		
02/20/01	HUM	Finalize default papers	. 30		
		Fees Billed		\$	166.50
	Disb	ursements			
	Copi	es \$	1.40		
		Total Disbursements	5	\$	1.40
		Total Current Bill		s	167.90
		Balance Due		\$	167.90 ======

### Fee Summary

M J Baird-Paralegal worked .40 hours at \$ 65 an hour. Paralegal PWH worked 1.40 hours at \$ 65 an hour.

ATTORNEYSATLAW

4300 Six Forks Road-Suite 700 Post Office Box 18237 Raleigh, North Carolina 27619

Telephone: 919/781-1311 Fax: 919/782-0465

Federal ID# 56-1201204 34599 Invoice 2

03/06/01

TO Holmes P. Harden c/o Maupin, Taylor & Ellis, PA 3200 Beechleaf Ct. POB 19764 NC 27604 Raleigh

Client Id. 00-12075

Matter Id. 000-000-007 Swh - Intn'lHeritageInc. "FYI" Worldwident Plide.

Return Upper Portion With Payment

Page

S W Humrickhouse worked .30 hours at \$165 an hour.

# NICHOLLS&CRAMPTON, P.A.

ATTORNEYS AT LAW

4300 Six Forks Road—Suite 700 Post Office Box 18237 Raleigh, North Carolina 27619

Telephone: 919/781-1311 Fax: 919/782-0465

Federal ID # 56-1201204
Invoice 34600

03/06/01

Holmes P. Harden

TOc/o Maupin, Taylor & Ellis, PA 3200 Beechleaf Ct. POB 19764

Raleigh

NC 27604

Client Id. 00-12075

Matter Id. 000-000-008 SWH - Inth'lHeritageInc / EGW Pers. Services, Inc Amount Paid: Return Upper Portion With Payment For legal services rendered; including but not limited to 01/17/01 P33 Complete review of file, . 40 reorganization of same, running of docket check list. 02/06/01 PL9 Prepare new summons to be . 40 re-issued. 02/08/01 PL9 'Reserve summons & complaint, . 30 Fees Billed 71.50 Disbursements .34 Postage \$ Copies \$ 2.00 Total Disbursements Total Current Bill 73.84 Balance Due 73.84 \*\*\*

### Fee Summary

M J Baird-Paralegal worked .40 hours at \$ 65 an hour. Paralegal PWH worked .70 hours at \$ 65 an hour.

ATTORNEYSATLAW

4300 Six Forks Road—Suite 700 Post Office Box 18237 Raleigh, North Carolina 27619

Telephone: 919/781-1311 Fax: 919/782-0465

Federal ID # 56-1201204 Invoice 34601

**03/06/01** 

Holmes P. Harden TO c/o Maupin, Taylor & Ellis, PA 3200 Beechleaf Ct. POB 19764 NC 276Ø4 Raleigh

Client Id. 00-12075 Matter Id. 000-000-009 SWH - Intn'lHeritageInc / Harrah's Operating Co Amount Paid: Return Upper Portion With Payment For legal services rendered; including but not limited to . 40 01/17/01 P33 Complete review of file, reorganization of same, running of docket check list. . 50 Meet with Angell re: settlement HUM 01/26/01 .30 Call to Angell, evaluate 02/02/01 HUM 'settlement offer Prepare Statement Regarding Intent .70 PL9 02/23/01 to More for Authority to Compromise, letter to defendant with proof of claim, deposit funds in trust account. Fees Billed 203.50 Disbursements .68

Postage

4.25 Copies

> Total Disbursements 4.93 208,43 Total Current Bill 208.43 Balance Due

# NICHOLLS&CRAMPTON, P.A.

ATTORNEYS AT LAW

4300 Six Forks Road—Suite 700 Post Office Box 18237 Raleigh, North Carolina 27619

Telephone: 919/781-1311 Fax: 919/782-0465

Federal ID # 56-1201204
Invoice 34601

03/06/01

TOHolmes P. Harden c/o Maupin, Taylor & Ellis, PA 3200 Beechleaf Ct. POB 19764 Raleigh NC 27604

Client Id. 00-12075

Matter Id. 000-000-009 SWH - Intn'lHeritageInc / Harrah's Openational Page Co

Return Upper Portion With Payment

Page

### Fee Summary

M J Baird-Paralegal worked .40 hours at \$ 65 an hour. S W Humrickhouse worked .80 hours at \$165 an hour. Paralegal PWH worked .70 hours at \$ 65 an hour.

ATTORNEYS AT LAW

4300 Six Forks Road—Suite 700 Post Office Box 18237 Raleigh, North Carolina 27619

Telephone: 919/781-1311 Fax: 919/782-0465

Federal ID # 56-1201204 Invoice

03/06/01

Holmes P. Harden

TOc/o Maupin, Taylor & Ellis, PA 3200 Beechleaf Ct. POB 19764 NC 27604 Raleigh

Client Id. 00-12075

navve, 10,		000-010 SWH - Int'lHeritageInc / John G		nt Paid:	
		For legal services rendered; including but not limited to	Return Upper l	Portion Wi	th Payment
01/17/01	P33	Complete review of file, reorganization of same, running of docket check list.	. 40		
02/19/01	PL9	Draft Motion and Affidavit for Entry of Default and Entry of Default.	.70		
02/20/01	HUM	Finalize default papers	. 30		
		Fees Billed		\$	121.00
	Disb	ursements			
	Copi	es \$	1.40		
		Total Disburseme	ents	\$	1.40
		Total Current Bi	111	\$	122.40
		Balance Due		\$ =====	122.40

## Fee Summary

M J Baird-Paralegal worked .40 hours at \$ 65 an hour. Paralegal PWH worked .70 hours at \$ 65 an hour. 5 W Humrickhouse worked .30 hours at \$165 an hour.

# NICHOLLS&CRAMPTON, P.A.

### ATTORNEYSATLAW

4300 Six Forks Road—Suite 700 Post Office Box 18237 Raleigh, North Carolina 27619

Telephone: 919/781-1311 Fax: 919/782-0465

Federal ID # 56-1201204 Invoice 34603

03/06/01

Holmes P. Harden

TO c/o Maupin, Taylor & Ellis, PA 3200 Beechleaf Ct. POB 19764 Raleigh NC 27604

Client Id. 00-12075

Matter Id. 000-000-011 SWH - Int'lHeritageInc / Travel Experts, Inc

· vary				Amou	nt Paid:	
		For legal services rendered; includ but not limited to	ing	Return Upper	Portion	With Payment
01/04/01	HUM	Conf. with David Boone re: settlement		. 40		
01/17/01	P33	Complete review of file, reorganization of file, running of docket check list.'		. 40		
01/19/01	HUM	`Letter to David Boone re: settlement		.30		
01/22/01	P33	Drafting/Preparation of Joint Preconference Report		. 50 ´		
01/25/01	P33	Preparation and finalization of Joint Preconference Report.		. 50		
01/30/01	P33	Drafting, finalization and filing of Statement/Authority to Move to Compromise.		. 30		
02/27/01	PL9	Letter to defendant with proof of claim, letter to Trustee with settlement check.		. 50		
		Fees Billed			\$	258,50
	Disb	ursements				
	Post	age	\$	1.70		
	Сорі	e s	\$	2.40		

### ATTORNEYSATLAW

4300 Six Forks Road—Suite 700 Post Office Box 18237 Raleigh, North Carolina 27619

Telephone: 919/781-1311 Fax: 919/782-0465

Federal ID # 56-1201204 **34603** 

Page

Invoice

03/06/01

<sup>TO</sup>Holmes P. Harden c/o Maupin, Taylor & Ellis, PA 3200 Beechleaf Ct. POB 19764 Raleigh NC 27604

Client Id. 00-12075

Matter Id. 000-000-011 SWH - Int'lHeritageInc / Travel Expertmount Post:

Return Upper Portion With Payment

Total Disbursements	\$ 4.10
Total Current Bill	\$ 262.60
Balance Due	\$ 262.60

### Fee Summary

S W Humrickhouse worked .70 hours at \$165 an hour. M J Baird-Paralegal worked 1,70 hours at \$ 65 an hour Paralegal PWH worked .50 hours at \$ 65 an hour.

# NICHOLLS&CRAMPTON, P.A.

ATTORNEYSATLAW

4300 Six Forks Road—Suite 700 Post Office Box 18237 Raleigh, North Carolina 27619

Telephone: 919/781-1311 Fax: 919/782-0465

Federal ID # 56-1201204
Invoice 34604

03/06/01

Holmes P. Harden

TOc/o Maupin, Taylor & Ellis, PA 3200 Beechleaf Ct. POB 19764

Raleigh

NC 27604

Client Id. 00-12075
Matter Id. 000-000-012 SWH - Intn'lHeritageInc / TanneryEntInc/Infostor

matter 10.	-ששש	000-012 SWH - Intn'lHeri		Am	ount Paid: _	
		For legal services rend	ered; includinç	= =	er Portion V	Vith Payment
		but not limited to				
01/05/01	P33	Drafting/Preparation of regarding Intent for Au Compromise	Statement thority to	. 50		
01/08/01	P33	Finalization and Filing Statement regarding Int Authority to Compromise	ent for	<b>,</b> 5Ø :		
02/08/01	PL9	Letter to defendant wit	h proof of	. 40		
02/12/01	P33	Preparation and filing to Compromise and Sett? Proceeding.	of Motion Le Adversary	. 50		·
02/14/01	P33	Preparation and filing Approving Compromise as Settlement of Adversary Proceeding.	nd	.50		
		,	Fees Billed		\$	156.00
	Dist	oursements				
	Post	tage	,	•	34	
	Сор	ies	\$	1.	50	
			Total Disbursem	ients	\$	1.54
			Total Current E	Bill	\$	157.54
			:120	1		

ATTORNEYSATLAW

4300 Six Forks Road—Suite 700 Post Office Box 18237 Raleigh, North Carolina 27619

Telephone: 919/781-1311 Fax: 919/782-0465

Federal ID# 56-1201204 34604

Invoice

Page

03/06/01

TO Holmes P. Harden c/o Maupin, Taylor & Ellis, PA 3200 Beechleaf Ct. POB 19764 Raleigh NC 27604

Client Id. 00-12075

Matter Id. 000-000-012 SWH - Intn'lHeritageInc / TanneryEnt Amodiki Paidstor

Return Upper Portion With Payment

Balance Due

157.54

=========

Fee Summary

M J Baird-Paralegal worked 2,00 hours at \$ 65 an hour Paralegal PWH worked .40 hours at \$ 65 an hour.

ATTORNEYS AT LAW

4300 Six Forks Road—Suite 700 Post Office Box 18237 Raleigh, North Carolina 27619

Telephone: 919/781-1311 Fax: 919/782-0465

Federal ID = 56-1201204 **3460**6 Invoice

03/06/01

Holmes P. Harden

TOc/o Maupin, Taylor & Ellis, PA 3200 Beechleaf Ct. POB 19764 NC 27604 Raleigh

Client Id. 00-12075

Matter Id. 000-000-013 SWH - Intn'lHeritageInc / Image Assoc Inc

Amount Paid: Return Upper Portion With Payment For legal services rendered; including but not limited to .20 Call to Jim Sprouse re: defenses 12/11/00 HUM .30 Conf. with Jim Sprouse re: 01/05/01 HUM settlement . 40 Complete review of file, 01/17/01 P33 reorganization of same, running of 'docket check list. .50 Drafting/Prepartion of Joint P33 01/22/01 Preconference Report . 40 Call to Jimmy Sprouse re: defenses HUM 01/26/01 .50 Drafting/Preparation of Joint 01/30/01 P33 Preconference Report .50 Finalization and forwarding of 01/30/01 P33 Joint Preconference Report. . 30 Finalize pretrial report HUM 01/31/01 Review documents from Defendant .30 HUM 02/12/01 Call to Ted Reynolds re: available .20 02/13/01 HUM defenses .20 Review letter from Sprouse with HUM 02/14/01 attachments re: settlement .30 Conf. with Ted Reynolds re: 02/22/01 HUM

# NICHOLLS&CRAMPTON, PA.

ATTORNEYSATLAW

4300 Six Forks Road—Suite 700 Post Office Box 18237 Raleigh, North Carolina 27619

Telephone: 919/781-1311 Fax: 919/782-0465

Federal ID # 56-1201204
Invoice 34606

2

03/06/01

TOHolmes P. Harden c/o Maupin, Taylor & Ellis, PA 3200 Beechleaf Ct. PDB 19764 Raleigh NC 27604

Client Id. 00-12075

Matter Id. 000-000-013 SWH - Intn'lHeritageInc / Image Assommbor Paid:

Return Upper Portion With Payment

Page

possible new value defense

02/26/01 HUM Conf. with Sprouse re: pretrial conf.

.20

Fees Billed \$ 519.50

Total Current Bill \$ 519.50

Balance Due \$ 519.50

## Fee Summary

S W Humrickhouse worked 2.40 hours at \$165 an hour. M J Baird-Paralegal worked 1.90 hours at \$ 65 an hour

ATTORNEYSATLAW

4300 Six Forks Road—Suite 700 Post Office Box 18237 Raleigh, North Carolina 27619

Telephone: 919/781-1311 Fax: 919/782-0465

Federal ID # 56-1201204 **3460**7 Invoice

03/06/01

Holmes P. Harden TO<sub>c</sub>/o Maupin, Taylor & Ellis, PA 3200 Beechleaf Ct. POB 19764 NC 27604 Raleigh

Client Id. 00-12075

Client Id. Matter Id.	000-0	2075 000-014 SWH - Intn'lHe	ritageInc / New	Orlean	5 Tour Amount	rs In Paid: _	
		For legal services re but not limited to	ndered; includi		Upper Po	rtion W	ith Payment
12/14/00	HUM	Review scheduling ord	er	. 30	ı		
01/17/01	P33	Complete review of fi reorganization of sam docket check list.	le, ie, running of	. 40	)		
01/18/01	PL9	Work on draft of Joir Pre-Conference Report	nt :-	1.00	ð		
01/19/01	HUM	Prepare pretrial repo transmit to opposing	ort and counsel	. 50	ð		·
01/29/01	P2Ø	Call to attorney for re: Joint Pretrial R	New Orleans eport	. 10	7		
01/31/01	HUM	Finalize pretrial re	port	. 3	0		
			Fees Billed			ş	279,00
	Dist	bursements					
	Cop:	 ies		\$	4.80		
	Del	ivery Charge		\$	7.50		
			Total Disburs	ements		\$	12.30
			Total Current	Bill		\$	291.30
			Balance Due			\$ ===:	291.30 =======
			. 1 1	20 days			

# NICHOLLS&CRAMPTON, P.A.

ATTORNEYSATLAW

4300 Six Forks Road—Suite 700 Post Office Box 18237 Raleigh, North Carolina 27619

Telephone: 919/781-1311 Fax: 919/782-0465

Federal ID # 56-1201204

Invoice Page

34607

03/06/01

TO Holmes P. Harden c/o Maupin, Taylor & Ellis, PA 3200 Beechleaf Ct. POB 19764 Raleigh NC 27604

Client Id. 00-12075

Matter Id. 000-000-014 SWH - Intn'lHeritageInc / New OrleanAmboursidInc

Return Upper Portion With Payment

### Fee Summary

S W Humrickhouse worked 1.10 hours at \$165 an hour. M J Baird-Paralegal worked .40 hours at \$65 an hour. Paralegal PWH worked 1.00 hours at \$65 an hour. S T Waller worked .10 hours at \$65 an hour.

ATTORNEYSATLAW

4300 Six Forks Road—Suite 700 Post Office Box 18237 Raleigh, North Carolina 27619

Telephone: 919/781-1311 Fax: 919/782-0465

Federal ID # 56-1201204 Invoice 34608

03/06/01

Holmes P. Harden

TOC/o Maupin, Taylor & Ellis, PA 3200 Beechleaf Ct. POB 19764 Raleigh NC 27604

Client Id. 00-12075

Matter Id. 000-000-015 SWH - Intn'lHeritageInc / WWFPaperCorp/WWF NY Dire

<del></del>	<del></del>	-000-015 SWH - Intn'lHeritageInc / WWF	Am	ount Paid:
		For legal services rendered; includi but not limited to	Return Upp <b>ng</b>	er Portion With Payment
11/29/00	HUM	Conf. with creditor attorney re: settlement, Letter to creditor	. 40	
01/05/01	P33	Drafting/Preparation of Statement regarding Intent for Authority to Compromise	. 50	
01/08/01	P33	Finalization and Filing of Statment regarding Intent for Authority to Compromise	<sup>;</sup> .50	
02/08/01	PL9	Letter to defendant with proof of claim.	. 40	·
02/12/01	P33	Preparation and filing of Motion to Compromise and Settle Adversary Proceeding.	. 50	
02/14/01	P33	Preparation and filing of Order Approving Compromise and Settlement of Adversary Proceeding.	. 50	
		Fees Billed		 \$ 222.00
	Disbu	rsements		
	Fax	\$	3,00	
	Posta	ge \$	. 34	

ATTORNEYS AT LAW

4300 Six Forks Road—Suite 700 Post Office Box 18237 Raleigh, North Carolina 27619

Telephone: 919/781-1311 Fax: 919/782-0465

Federal ID# 56-1201204 Invoice 34608

Page

03/06/01

TO Holmes P. Harden c/o Maupin, Taylor & Ellis, PA 3200 Beechleaf Ct. POB 19764 NC 27604 Raleigh

Client Id. 00-12075

Matter Id. 000-000-015 SWH - Intn'lHeritageInc / WWFPaperConpublishY Dire

Return Upper Portion With Payment

Copies

1.20 \$

	=====	=======
Balance Due	\$	226.54
Total Current Bill	\$	226.54
Total Disbursements	\$	4.54

Fee Summary

S W Humrickhouse worked .40 hours at \$165 an hour, M J Baird-Paralegal worked 2.00 hours at \$ 65 an hour Paralegal PWH worked .40 hours at \$ 65 an hour.